



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

SEP 25 2013

REPLY TO THE ATTENTION OF:

Stephen Weis
Department of Environmental Quality
Detroit District Office
3058 West Grand Boulevard
Suite 2-300
Detroit, Michigan 48202

Dear Mr. Weis:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft renewal operating permit for Detroit Water and Sewerage Department Detroit Wastewater Treatment Plant. (Permit number MI-ROPB2103-201X). Below is our comment:

The seventeen generators in FGEngines are subject to 40 CFR, Part 60, Subparts IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) and JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines), as well as 40 CFR Part 63, Subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines). As described in the Staff Report, the draft permit contains a general, high level citation and no details regarding the requirements of these subparts. MDEQ should include the detailed requirements of the subparts in the draft permit. The applicable Title V operating permit regulations at 40 C.F.R. § 70.6 require that a permit include emission limitations and standards, including those operational requirements at the time of permit issuance. EPA's March 5, 1996 White Paper Number 2 for Improved Implementation of the Part 70 operating permits program provides clarifying guidance on steps to incorporating applicable regulations into a Title V permit.

We would like to thank you again for working with us in making sure that these issues were resolved in a timely manner. If you have any further questions, please feel free to contact Constantine Blathras at (312) 886-0671.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico".

Genevieve Damico
Chief
Air Permits Section